



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 North Grand Avenue East, P.O. Box 19276, Springfield, Illinois 62794-9276 • (217) 782-2829
James R. Thompson Center, 100 West Randolph, Suite 11-300, Chicago, IL 60601 • (312) 814-6026

PAT QUINN, GOVERNOR

DOUGLAS P. SCOTT, DIRECTOR

March 17, 2010

Mr. Bryan Stone, PE
AMEC Geomatrix, Inc.
510 Superior Avenue, Suite 200
Newport Beach, CA 92663-3627

Re: LPC # 1198010003 - Madison County
Hartford/Chemetco, Inc.
Comments on the Foundry Building Demolition Work Plan

Dear Mr. Stone,

The purpose of this letter is to transmit comments concerning the Foundry Building Demolition Work Plan AMEC submitted on behalf of Industrial Asset Disposition, LLC.

Site Preparation Activities:

A number of the plan provisions lack the necessary detail to fully evaluate whether the proposed work will comply with the Interim Consent Order (or proposed Consent Decree) including failing to identify Applicable or Relevant and Appropriate Requirements (ARARs) or to describe how the work will comply with those obligations.

The plan does not comport with the guidelines applicable to Work affected materials (WAM) - In accordance with the Interim Order, there is to be no consolidation of materials associated with the work performed under this plan with existing materials.

Further, under Section V General Provisions, 5. Commitment to Proper Management of the Facility, The Trustee shall manage the Facility in accordance with this Interim Order and in accordance with all plans, standards, specifications, and schedules set forth in or developed in Work Plans approved by the State, pursuant to this Interim Order.

The trustee shall manage all Work Affected Materials as if it were a RCRA Hazardous Waste in accordance with the hazardous Waste regulations.

While we understand that Work Affected Material resulting from these activities may be used in planned processing activities, the plan does not describe how those materials will be identified, how and when they will be incorporated into the processing schedule or what their disposition will be if found to be unsuitable for processing. The plan must demonstrate that retention of these materials will benefit the Estate and not become a lingering problem.

Rockford • 4302 N. Main St., Rockford, IL 61103 • (815) 987-7760

Elgin • 595 S. State, Elgin, IL 60123 • (847) 608-3131

Bureau of Land — Peoria • 7620 N. University St., Peoria, IL 61614 • (309) 693-5462

Collinsville • 2009 Mall Street, Collinsville, IL 62234 • (618) 346-5120

Des Plaines • 9511 W. Harrison St., Des Plaines, IL 60016 • (847) 294-4000

Peoria • 5415 N. University St., Peoria, IL 61614 • (309) 693-5463

Champaign • 2125 S. First St., Champaign, IL 61820 • (217) 278-5800

Marion • 2309 W. Main St., Suite 116, Marion, IL 62959 • (618) 993-7200

Section 2.2, paragraph 6 states: *the metal bearing material present in many areas of the proposed demolition work areas will be collected, consolidated, and temporarily stored on-site during the demolition phase to more safely allow many of the former structures to be demolished in preparation for on-site processing activities.*

The plan does not fully describe how those materials will be collected or the ARARs applicable to such activities. The plan does not define what is meant by “consolidated”, where or how that will be done or the ARARs applicable to such activities. **There cannot be any consolidation of materials associated with the work performed under this plan with existing materials.** The plan does not fully describe how those materials will be temporarily stored or the ARARs applicable to such activities.

Section 3.1, bullet point 11 states: *Collect slag materials and small stockpiles located on the slab surfaces in proposed staging areas and adjacent to structures proposed for demolition and consolidate it on-site with like materials in existing stockpiles for future processing activities.*

The plan does not fully describe how those materials will be collected or the ARARs applicable to such activities. **There cannot be any consolidation of materials associated with the work performed under this plan with existing materials.** The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.

Section 4.0, paragraph 4 states: *Metal Bearing Materials that are collected and handled as part of the demolition work will be stored in a contained and controlled manner. If during demolition work it becomes necessary to relocate stockpiles of materials (ex. Slag pile blocking dock at Dome Building), they will be relocated to stockpiles of similar materials and in a manner that does not increase the potential for release from the Site.*

The plan does not fully describe how those materials will be collected or the ARARs applicable to such activities. **There cannot be any consolidation of materials associated with the work performed under this plan with existing materials.** The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.

Section 5.4, paragraph 3 states: *Slag and metal bearing materials that are present within the proposed demolition work zone and adjacent staging areas will be collected and consolidated with other existing larger piles of similar composition until they can be processed on Site under procedures to be described in a subsequent Slag Processing Work Plan.*

The plan does not fully describe how those materials will be collected or the ARARs applicable to such activities. **There cannot be any consolidation of materials associated with the work performed under this plan with existing materials.** The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.

Section 5.5.3 states: *Existing piles of scrubber sludge and slag fines present in the Dome Building will be relocated into the adjacent DIS building or with other larger piles of like material, for storage until subsequent on-Site processing can be performed.*

The plan does not fully describe how those materials will be collected or the ARARs applicable to such activities. **There cannot be any consolidation of materials associated with the work performed under this plan with existing materials.** The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.

Section 5.5.3, Wet Decontamination Facility – No material from the Dome Building may be moved to any other area of the Chemetco Facility other than the DIS Building. No fines from the Dome Building may be stored outside. **There cannot be any consolidation of materials associated with the work performed under this plan with existing materials.** The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.

Section 3.6, paragraph 2 states: *A portion of the AAF area is subject to additional cleanup measures as described in the work plan titled "RCRA Closure Plan, AAF Decontamination Area and Sump, January 31, 2008." Prior to commencing with the proposed AAF demolition activities, the remediation objectives described in the RCRA Closure Plan associated with cleaning the slab and sealing the sump in this area will be implemented and documented, so the space will be available as useable working and lay-down areas during the subsequent demolition activities there. The closure documentation associated with the RCRA Closure Plan will be submitted to the IEPA along with other demolition related completion documents at the conclusion of the demolition activities described in this Plan. The Estate considers approval of this Work Plan to be approval of a modification of the IO consistent with the discussion in this paragraph.*

The work performed pursuant to the RCRA Closure Plan, AAF Decontamination Area and Sump shall be certified as complete in accordance with the Interim Order Section XIII. Certification of Completion, paragraph 46. Completion of Work Plans. The Certificate of Completion shall be obtained **prior** to demolition of the AAF Area.

Section 5.7 AAF Decontamination Area and Sump, paragraph following item 6 states: *Once the AAF Decontamination area has been cleared and the sump is sealed, the AAF decontamination area and sump will be open and available to the contractor without restriction for staging and/or lay down of equipment or other uses.*

The work performed pursuant to the RCRA Closure Plan, AAF Decontamination Area and Sump shall be certified as complete in accordance with the Interim Order Section XIII. Certification of Completion, paragraph 46. Completion of Work Plans. The Certificate of Completion shall be obtained **prior** to demolition of the AAF Area.

Section 8.0 Record drawings and Closure/Completion Certification states: *Within 45 days of completion of demolition and waste disposal activities and receipt of all disposal records, a completion report will (be) prepared and submitted to IEPA that includes information regarding the RCRA closure documentation associated with the AAF Decontamination Area and Sump.*

The work performed pursuant to the RCRA Closure Plan, AAF Decontamination Area and Sump shall be certified as complete in accordance with the Interim Order Section XIII. Certification of Completion, paragraph 46. Completion of Work Plans. The Certificate of Completion shall be obtained **prior** to demolition of the AAF Area.

Section 6.0 Demolition Activities, paragraph 1 states: *Demolition activities will be performed by a licensed environmental demolition contractor under contract with IAD. Demolition activities will include removal of above ground piping, ductwork, and above ground storage tanks (ASTs) located within the demolition zone, removal and salvage of furnace ovens located in the Foundry Building, followed by demolition to slab grade of the Foundry, AAF, Baghouse and Control Room, Restroom, and Hydraulic Bailer Room, management of decontamination-derived materials, debris handling, and debris disposition and recycling.*

Please state that all interior decontamination of the Foundry Building, the management of decontamination-derived materials, and debris handling, and arrangements for debris disposition and recycling will be made prior to the removal and salvage of furnace ovens located in the Foundry Building.

Please provide the name of the Site Safety Supervisor to the IEPA prior to the start of demolition.

Section 4.5 General Recordkeeping: Please provide the names of all contractor, subcontracts and employees. Include records of the amount of OSHA and EPA training each employee has received.

Section 5.4.4 Metal bearing materials, such as the furnace feed material in the Foundry Building, must be repackaged in containers that are in good condition prior to being moved out of the Foundry Building. Once removed from the Foundry Building the containers must be stored in secured location (i.e., inside under cover). The plan does not fully describe how those materials will be collected or the ARARs applicable to such activities **There cannot be any consolidation of materials associated with the work performed under this plan with existing materials** The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.

Section 5.6 Collection and Consolidation of Scrubber Sludge Dust – Collected dust must be managed in a tank or container. It is proposed to transport the fines to Fines Building. The Fines Building is a three sided building that is exposed to the elements. This building already contains a large amount of slag and slag fines. The plan must fully describe how those materials will be collected and the ARARs applicable to such activities **There cannot be any consolidation of materials associated with the work performed under this plan with existing materials** The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.

Section 5.9 Hazardous Building Material Survey – This survey identified mercury switches, fluorescent bulbs and PCB ballasts. This waste does not meet the definition of household hazardous waste. These materials are fully regulated by 35 IAC 721 – 809. The plan must be revised to describe the proper handling and disposition of such materials.

Section 6.3 Foundry, Baghouse and Control Room demolition – There is no mention on how the large amount of zinc oxide that is in the baghouse and baghouse collection trailer will be managed. The plan must fully describe how those materials will be collected and the ARARs applicable to such activities. **There cannot be any consolidation of materials associated with the work performed under this plan with existing materials.** The plan must be revised to fully describe how those materials will be temporarily stored and the ARARs applicable to such activities.

Any concrete generated as a result of any demolition activity may not meet the definition of Clean Construction or Demolition Debris (CCDD). All concrete must be sampled for total metals prior to crushing and reuse as fill on-site or disposal and/or transport to an off-site concrete recycling facility. IAD must obtain approval from the IEPA before classifying and concrete as CCDD, using the material as on-site fill or sending the concrete off-site.

TABLE 2 – wood, building debris, plastic and concrete are separate waste streams. Each waste steam must be sampled for TCLP metals prior to off-site disposal. Electronic waste (computer monitors and circuit boards) may not be disposed of at a landfill. These wastes may be considered hazardous wastes when sent for disposal as a solid waste.

Comments forwarded to Illinois EPA from U.S.EPA:

Section 2.3 and 5.2

The difference between existing and proposed storm water management and control measures appears to be a silt fence along the southern edge of the facility site. Implementation of the proposed stormwater best management practices (BMPs) should be documented in any reports required by Illinois EPA. Discharges from Outfall #5 must comply with the facility's National Pollutant Discharge Elimination System permit.

Section 3.3 and 6.7

The proposed demolition plan for the Black Acid Tank Solid Waste Management Unit (SWMU) should meet the substantive requirements for closure under the Resource Conservation and Recovery Act (RCRA).

Section 3.4 and 6.4.3

Regarding disposal of the refractory brick, a determination should be recorded whether this is RCRA hazardous waste produced in the former Brick Shop. It is estimated that 70 tons of this material is on site.

Section 4.3

It is the position of EPA that all work activities at the site be performed in compliance with applicable federal and state Occupational Safety and health Administration regulations for all types of wastes and activities at the site, and the Illinois EPA should review the Health and Safety Plan prior to initiating field activities.

Section 4.5 and 5.10

Section VI.A.16 of the IO requires shipping manifests be submitted to the State at time of shipment, and the Plan proposes keeping records on site until work completion. This represents a time delay between event occurrence and submitting documents.

The Plan does not address demolition methods or impacts on refrigerants or underground structures/utilities/wells that may be encountered.

If you believe that it may be helpful to meet with us to discuss our above provided comments prior to submittal of a revised Foundry Building Demolition Work Plan, or if there are any questions concerning the above, please do not hesitate to contact me at 217-785-8725.

Sincerely,



Erin J. Rednour
Project Manager
National Priorities List Unit
Federal Sites Remediation Section
Bureau of Land
Illinois Environmental Protection Agency